

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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NANCY BROOKS AND JOAN SILVERMAN,
:
Plaintiffs, : Civil Action
: No. 05-10994-WGY
v.
:
AIG SUNAMERICA LIFE ASSURANCE
COMPANY, :
:
Defendant. :
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DEFENDANT'S LOCAL RULE 16.1(D)(3) CERTIFICATION

Pursuant to Local Rule 16.1(D)(3), the undersigned counsel and duly authorized representative of AIG SunAmerica Life Assurance Company, have conferred:

- (a) with a view to establishing a budget for the costs of conducting the full course -- and various alternative courses -- of the litigation; and
- (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Dated: November 7, 2005
Boston, Massachusetts

Respectfully submitted,

/s/ Gavin D. Friedman
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